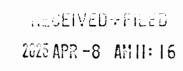
## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION



In re:	§	Chapter 11
23ANDMEHOLDING CO., et al.,	8 8	Case No. 25-40976
Debtors.	8 §	(Jointly Administrated)

## **VERIFIED MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Bankruptcy Rule 2090 and Rule 12.01(E) of the local rules of the United States District Court for the Eastern District of Missouri, I, Abigail R. Ryan, move to be admitted pro hac vice to the bar of this Court for the purpose of representing the following governmental entities in the instant matter:

State/Territory	Client Name
Arizona	The State of Arizona, ex rel. Kristin K. Mayes, the Attorney General
District of Columbia	District of Columbia, Office of the Attorney General
Florida	State of Florida, Office of the Attorney General, Department of Legal Affairs
Louisiana	State of Louisiana
Michigan	Michigan Attorney General, ex rel. the People of the State of Michigan
Oregon	Oregon Attorney General Dan Rayfield
Vermont	State of Vermont by and through the State Attorney General
Washington	Attorney General Nick Brown
West Virginia	Office of the West Virginia Attorney General
Wisconsin	State of Wisconsin

In support of this motion, I submit the following information as required by Rule

## 12.01(E):

- a. Full name of the movant-attorney:
  Abigail Rushing Ryan
- b. Address and telephone number of the movant-attorney: 1850 M Street NW, 12<sup>th</sup> Floor Washington, D.C. 20036 (202) 326-6000, Ext. 258
- c. Name of the firm or letterhead under which the movant practices:
  National Association of Attorneys General
- d. Name of the law school(s) movant attended and the date(s) of graduation therefrom: Texas Wesleyan School of Law (now known as Texas A&M School of Law). Graduation date: May 13, 2005
- e. State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any:

Court	<b>Date of Admission</b>	Registration/Bar Number
Texas Supreme Court	November 4, 2005	24035956
United States Supreme Court	November 25, 2024	NA
United States Court of Appeals for the Fifth Circuit	August 10, 2023	NA
United States District Court for the Northen District of Texas	February 10, 2025	NA
United States District Court for the Southern District of Texas	February 21, 2006	614700
United States District Court for the Eastern District of Texas	June 28, 2006	NA
United States District Court for the Western District of Texas	April 13, 2006	NA

f. I am a member in good standing of all bars of which I am a member, and I am not under suspension or disbarment from any bar;

g. I do not reside in the Eastern District of Missouri, I am not regularly employed in this District, and I am not regularly engaged in the practice of law in this District.

I attest under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully request that this motion be granted, and that I be admitted pro hac vice to the bar of this Court and be allowed to appear in the instant matter.

Dated: April 3, 2025, Austin, Texas Respectfully, submitted,

ABIGAIL R. KYAN

BANKRUPT CY COUNSEL

NATIONAL ASSOCIATION OF ATTORNEYS GENERAL

1850 M Street NW, 12th Floor

Washington, DC 20036

Telephone: (202) 326-6000, Ext. 258

Email: aryan@naag.org

COUNSEL FOR:

THE STATE OF ARIZONA, EX REL. KRISTIN K. MAYES, THE ATTORNEY GENERAL

DISTRICT OF COLUMBIA, OFFICE OF THE ATTORNEY GENERA

STATE OF FLORIDA, OFFICE OF THE ATTORNEY GENERAL, DEPARTMENT OF LEGAL AFFAIRS

STATE OF LOUISIANA

MICHIGAN ATTORNEY GENERAL, EX REL. THE PEOPLE OF THE STATE OF MICHIGAN

OREGON ATTORNEY GENERAL DAN RAYFIELD

STATE OF VERMONT BY AND THROUGH THE STATE ATTORNEY GENERAL

OFFICE OF THE WEST VIRGINIA ATTORNEY GENERAL

WASHINGTON ATTORNEY GENERAL NICK BROWN

STATE OF WISCONSIN

## **CERTIFICATE OF SERVICE**

I certify that on Thursday, April 3, 2025. a true and correct copy of the foregoing Verified Motion for Pro Hac Vice was sent via overnight courier to the Clerk of the United States Bankruptcy Court for the Eastern District of Missouri, and as listed below, it has been served via email on the attorneys for the parties involved in the platter and the United States Trustee.

United States Trustee

United States Department of Justice

State of Indiana State of Missouri State of Tennessee Debtors' Counsel

carole.ryczek@usdoj.gov;

Joseph.schlotzhauer@usdoj.gov

joshua.m.jones@usdoj.gov;

Heather.Crockett@atg.in.gov

edmoecf@dor.mo.gov;

marvin.clements@ag.tn.gov;;

thr@carmodymacdonald.com; wclareman@paulweiss.com;

pbasta@paulweiss.com;

lcastillo@paulweiss.com;

jsimms@paulweiss.com;

jchoi@paulweiss.com;

ghotz@paulweiss.com;

chopkins@paulweiss.com;

nrw@carmodymacdonald.com;

jjg@carmodymacdonald.com

ree@carmodymacdonald.com;

rlemons@goodwinlaw.com;

lparres@lewisrice.com;

klynn@goodwinlaw.com;

dhoehne@goodwinlaw.com;

dgoing@atllp.com;

eedelman@atllp.com

Jason.Kestecher@skadden.com;

joseph.larkin@skadden.com;

ron.meisler@skadden.com;

Evan.Hill@skadden.com

Counsel to JMB Capital Partners Lending,

Counsel to the Special Committee Board of

LLC

**Directors** 

Counsel to TTAM 2.0, LLC

jeffrey.kalinowski@nortonrosefulbright.com;

josh.watts@nortonrosefulbright.com;

kristian.gluck@nortonrosefulbright.com;

robert.hirsh@nortonrosefulbright.com;

james.copeland@nortonrosefulbright.com